

## State Water Resources Control Board

April 3, 2018

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7017 2680 0000 6289 5432**

Mr. Douglas Williams  
Facilities Maintenance Coordinator  
City of Santa Rosa  
100 Santa Rosa Avenue  
Santa Rosa, California  
[dwilliams@srcity.org](mailto:dwilliams@srcity.org)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT CITY OF SANTA ROSA FLEET MAINTENANCE, 55 STONY  
POINT ROAD, SANTA ROSA**

Dear Mr. Williams:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on March 21, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Provide Valid BOE Number</b> – The BOE number is invalid.	All	March 21, 2018	Ongoing	H&SC 25286(c)(9)
2	<b>Failure to Maintain Facility Information</b> – In the facility information form, under financial responsibility, two mechanisms are listed. Clarify which one is being used.	All	March 21, 2018	Ongoing	23 CCR 2711(a)
3	<b>Failure to Maintain Tank Information</b> – In the tank information forms, under overfill protection, “fill tube shut-off valve” lists “yes.” The designated operator (DO) present during the inspection indicated that ball floats and alarms are being used.	All	March 21, 2018	Ongoing	23 CCR 2711(a)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	<b>Failure to Maintain Monitoring Plan</b> – In the monitoring plans, the following sections are incomplete: tank monitoring, periodic system testing, recordkeeping, and personnel responsibilities.	All	March 21, 2018	Ongoing	23 CCR 2632(d)(1), 2711(a)(9)
5	<b>Failure to Maintain Release Response Plan</b> – An UST release response plan must be uploaded to CERS.	All	March 21, 2018	Ongoing	23 CCR 2632(d)(2)
6	<b>Failure to Maintain Financial Responsibility</b> – The Certificate of Financial Responsibility and the Chief Financial Officer letter contain errors and must be updated.	All	March 21, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
7	<b>Failure to Maintain Plot Plan/Site Map</b> – The site map must be updated to include underground piping, the location and identity of each alarm (example “L12”), and a landmark such as a building or street.	All	March 21, 2018	Ongoing	23 CCR 2711(a)(8)
8	<b>Failure to Maintain Monitoring or Testing Records Onsite</b> – All testing records and the previous six months of DO monthly inspection reports were not onsite at the time of inspection.	All	March 21, 2018	Ongoing	23 CCR 2712(b), 2715(e)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Santa Rosa City Fire Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[rebecca.green@waterboards.ca.gov](mailto:rebecca.green@waterboards.ca.gov)

**Local CUPA**

Ms. Kemplen Robbins  
Fire Inspector  
Santa Rosa City Fire Department  
2373 Circadian Way  
Santa Rosa, California 95407  
[krobbins@srcity.org](mailto:krobbins@srcity.org)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: (via email only)

Mr. James Castro  
Facilities Crew Supervisor  
City of Santa Rosa  
[jcastro@srcity.org](mailto:jcastro@srcity.org)

Mr. Paul Lowenthal  
CUPA Program Manager  
Santa Rosa Fire Department  
[plowenthal@srcity.org](mailto:plowenthal@srcity.org)

Ms. Kemplen Robbins  
Fire Inspector  
Santa Rosa City Fire Department  
[krobbins@srcity.org](mailto:krobbins@srcity.org)